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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL MATE G PHAIS TIGH OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
TO UNITED STATES POSTAL SERVICE WITNESS KAY
(MPA/USPS-T21-1)
(November 20, 2001)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Magazine Publishers of America, Inc. (MPA) directs the following interrogatories to United States Postal Service witness Kay (USPS-T-21).

Respectfully submitted,

Vames Pierce Myers

Counsel for MAGAZINE PUBLISHERS OF AMERICA, INC.

James Pierce Myers Attorney at Law 1617 Courtland Road Alexandria, VA 22306 Phone: 703-660-1002 Fax: 703-660-1037 jpm@piercemyers.com Docket No. R2001-1

MPA/USPS-T21-1. Please refer to Section IV of your testimony regarding rural

carrier costs.

(a) What percentage of Periodicals Outside-County mail volume is delivered by

rural carriers?

(b) Please confirm that the rural carrier costing method used by the Postal

Service in this case is exactly the same as that used by the Commission in

Docket No. R2000-1. If not confirmed, please explain all differences.

(c) Please provide the unit rural carrier cost for casing and delivering a Carrier

Route flat that is not in Line Of Travel (LOT) sequence and the unit rural carrier

cost for casing and delivering a Carrier Route flat that is in LOT sequence.

Please explain why these unit cost figures are the same or why they are different.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon

all participants of record in this proceeding in accordance with Rule 12 of the

rules of practice.

James Pierce Myers

Counsel for

MAGAZINE PUBLISHERS OF AMERICA, INC.

November 20, 2001 Alexandria, VA

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